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United States. Environmental Protection Agency. Montana Office
Clark Fork superfund sites master plan

# CLARK FORK SUPERFUND SITES
# MASTER PLAN

## 1996 UPDATE

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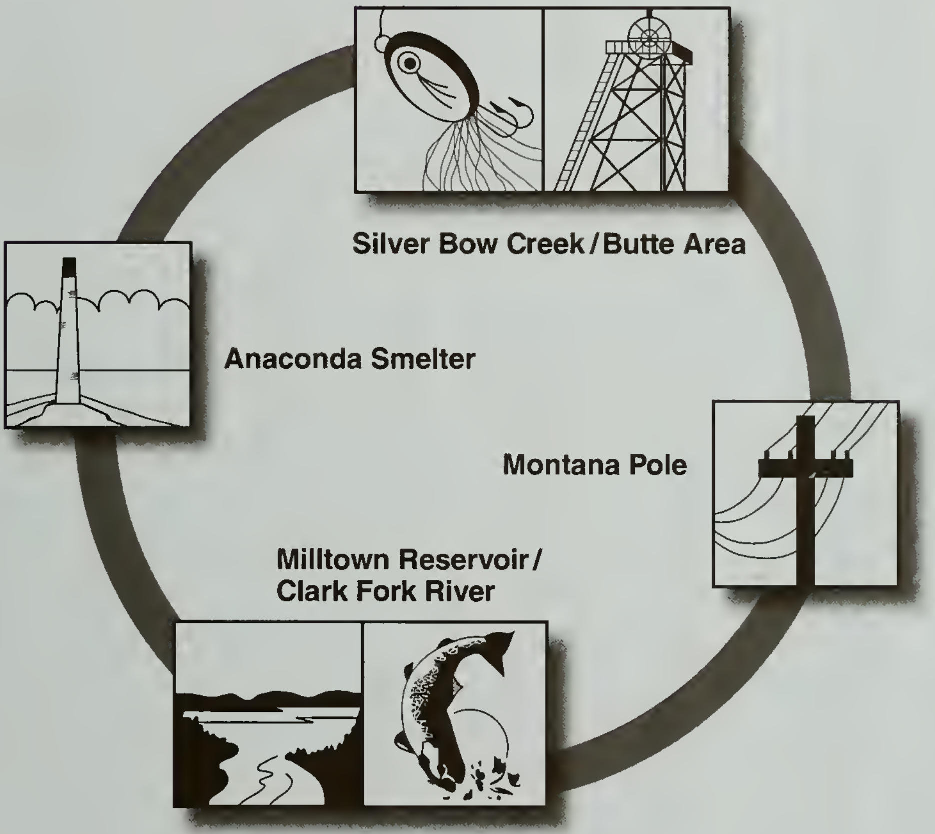
Silver Bow Creek / Butte Area
Anaconda Smelter
Montana Pole
Milltown Reservoir / Clark Fork River

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August 1996

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This document has been prepared for public distribution by the U.S. Environmental Protection Agency Region VIII, Montana Office, and the Montana Department of Environmental Quality.

The schedules presented in this master plan are the best present estimates for these activities.

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## I. Introduction and Purpose

More than seven years have passed since the first Clark Fork Superfund Sites Master Plan for cleanup was published. Tackling a river basin cleanup of this magnitude and with such a range of diverse stakeholder interest was without precedent. Nevertheless, much has been accomplished and much has been learned with each passing year, particularly regarding the vital importance of good communication with the public.

Four years ago the last Master Plan outlined ways to improve the Superfund process and speed cleanups. Now we are approaching the final stage of basin-wide cleanup activities. It is appropriate now in this Master Plan Update to describe how the remaining cleanup activities will complement each other and build on accomplishments already achieved. This should occur with even more outreach to the affected stakeholders to further protect and improve human health and the environment in the Clark Fork River Basin.

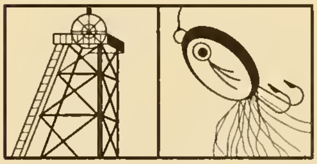
## II. A Basin-Wide Cleanup Perspective

The 1990 Master Plan first described the way the agencies would set priorities and sequence cleanup activities at the 28 operable units defined in that plan. The "framework for action" defined planned activities but also recognized that a cleanup program of this magnitude and complexity must be flexible and dynamic. Reaching tough decisions that affect many different interests in the basin, negotiating enforceable legal documents with potentially responsible parties (PRPs), and responding to competing budget priorities and evolving agency Superfund guidance have all contributed to the dynamic and somewhat unpredictable pace of cleanup in the basin. Nevertheless, much has been accomplished in line with the projected activities described in the 1990 plan.

A critical management challenge of the remaining activities is to be sure they fit together most effectively to achieve the best cleanup as soon as possible. This Master Plan describes how the upstream to downstream activities are intended to fit together in a comprehensive, logical package. An important fact to recognize was evident from the start of cleanup: that certain critical human health and environmental problems had to be addressed through interim actions early in the cleanup process even though they were not necessarily located at the most upstream locations. EPA and MDEQ expect that final cleanup decisions will confirm these early actions as contributing to overall effective protection of human and environmental health.

The Clark Fork Superfund Sites can be grouped into three areas when considering the need for appropriate sequencing of upstream versus downstream cleanup activities. The three areas are: 1) Butte and the Silver Bow Creek drainage including the Warm Springs Ponds; 2) the Clark Fork River/Milltown Reservoir corridor; and, 3) the Anaconda Smelter area. The geographic areas are depicted on page 2. The major actions that are described in the following sections are also presented graphically on the schedules shown at the back of this booklet. The discussion to follow presumes that the reader has some familiarity with site problems and activities described in earlier versions of the Master Plan, particularly the 1990 Plan.

### *A. Butte/Silver Bow Creek Drainage*



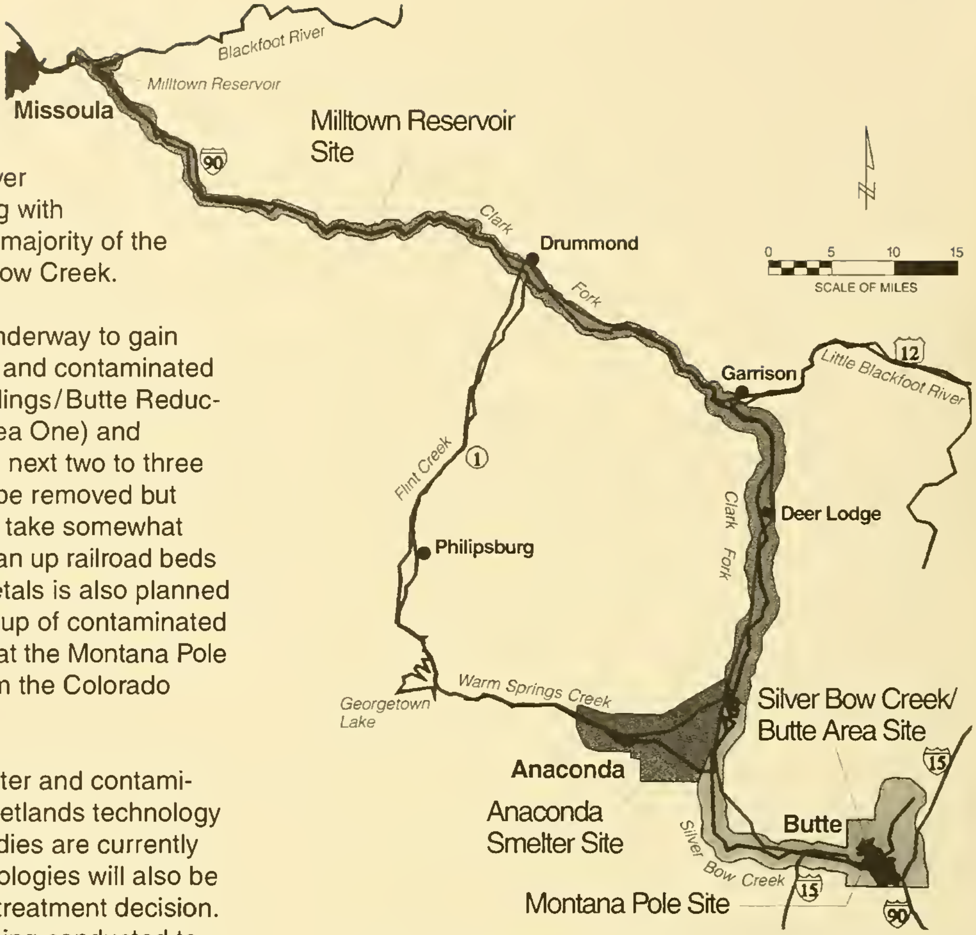
Important sequencing of cleanup actions begins with the head waters of Silver Bow Creek in Butte. The Priority Soils operable unit (OU) and the Mine Flooding OU comprise the major Superfund activity related to mining in Butte. The Montana Pole site, another big effort, focuses on cleanup of organic wastes contributing to problems in the drainage. The first two projects address the land surface contamination resulting from historic mining wastes and the ground water contamination resulting from the flooding of the underground mines. A major decision was made in 1994 to reduce the filling rate of the Berkeley Pit from controllable surface water sources and, ultimately, to hold the level of the water in the Pit at a safe level. This should prevent any release of contaminated ground water away from the Pit. Construction of facilities to reduce the inflow of water to the Pit was completed in April 1996. If additional control or treatment facilities are needed to assure a safe level of water in the Pit for the long term, they will be put in place well in advance of the need.

Much of the cleanup effort in Butte up to now has been directed toward reducing the exposure of humans to elevated lead and arsenic levels in mining wastes and contaminated soils in the Priority Soils OU. Most sources of these contaminants have been cleaned up and an innovative, multi-pathway residential yard and play area cleanup program is underway to ensure that the most sensitive population, the children, are protected. Now the primary focus is shifting toward gaining control of contaminated surface storm water runoff from the Butte Hill and shallow alluvial ground water, both of which flow into Silver Bow Creek. These sources, along with floodplain wastes, contribute the majority of the metals toxicity evident in Silver Bow Creek.

Expedited cleanup actions are underway to gain control of storm water on the Hill and contaminated ground water at the Colorado Tailings/Butte Reduction Works (also called Lower Area One) and contributing drainages during the next two to three years. Contaminant sources will be removed but ground water treatment will likely take somewhat longer. An expedited action to clean up railroad beds that are significant sources of metals is also planned for 1996. At the same time, cleanup of contaminated soils and ground water will occur at the Montana Pole site across Silver Bow Creek from the Colorado Tailings.

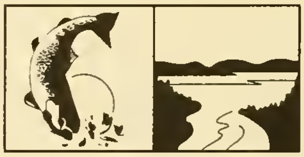
Since final treatment of storm water and contaminated ground water may utilize wetlands technology for metals control, treatability studies are currently underway. Other treatment technologies will also be evaluated prior to making a final treatment decision. Additional wetland studies are being conducted to evaluate removal of nutrients from the Butte municipal waste water discharge so that discharge does not prevent attainment of water quality goals in Silver Bow Creek after metals are reduced. A final decision on treatment needs will be made in approximately three years at the conclusion of the wetland studies and the Butte Priority Soils remedial investigation/feasibility study (RI/FS).

Gaining control of the majority of the waste sources contributing to contaminated surface and ground water from the Butte area through expedited projects during the next two to three years will allow cleanup of streamside tailings to begin along Silver Bow Creek. Efforts will be made to attempt to speed up these projects as much as possible. A comprehensive design for cleanup of Silver Bow Creek will be developed during 1996 and implementation in some reaches of the stream should begin in 1997. The design will determine how some elements of the tailings cleanup can proceed without the threat of recontamination as upstream controls on storm water and ground water are being constructed. To minimize recontamination it is essential that the storm water and ground water controls be expedited on the Hill and at the Colorado Tailings.



The Warm Springs Ponds have been upgraded and are in a final shakedown phase to improve operations and better protect the Clark Fork River during the cleanup of the streamside wastes along Silver Bow Creek. To the extent that all upstream cleanups are effective in removing metals that presently flow down the creek into the Ponds, the Warm Springs Ponds are expected to perform as intended and may not have to treat Silver Bow Creek in the future. In fact, the desired goal would be for the entire stream system (Silver Bow Creek and the Clark Fork River) to be a self-sustaining trout fishery with no need for treatment while retaining the ponds as a wildlife area. This possibility will be assessed during periodic reviews of the performance of all cleanups in the basin where residual wastes are left in place.

### *B. Clark Fork River/Milltown Reservoir*

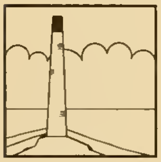


The second area where upstream/downstream considerations occur begins at the discharge from the Warm Springs Ponds and extends downstream along the Clark Fork River to Missoula. The Warm Springs Ponds are intended to treat Silver Bow Creek to a quality such that the trout fishery downstream in the Clark Fork River is protected. However, much work is needed on the upper Clark Fork River itself (below the Warm Springs Ponds) to reduce metals input from streamside tailings and associated wastes.

EPA resources have finally allowed startup of a comprehensive investigation of the river. An initial study of existing information is currently underway with a high level of public input. Further study of erosion and transport of contaminated materials is also being done. Cleanup alternatives will be evaluated and a decision on the appropriate cleanup action is expected to be made in 1998. Reclamation demonstration projects have shown that amending tailings areas and planting them with native grasses and stabilizing stream banks to minimize both erosion and downstream transport of sediment and associated metals into the Clark Fork River and Milltown Reservoir are important elements of any future cleanup action. In addition, removal of tailings in selected areas will be evaluated.

Milltown Reservoir itself is currently scheduled for a final decision concerning contaminated ground water and reservoir sediments in 1997. The agencies understand the need to appropriately evaluate the complex situation of reservoir inputs and outputs of sediment and metals during widely fluctuating flow events. This evaluation in 1996 and 1997 will afford all interested parties meaningful opportunities for input as alternatives are considered and a decision is made. Any decision will reflect full and careful consideration of all the Superfund remedy selection criteria.

### *C. Anaconda Smelter Site*



The issue of cleanup priorities has always been an important consideration at the Anaconda Smelter site. Numerous expedited actions and final cleanup decisions have been implemented to reduce the highest priority human and environmental threats from smelter wastes. Several modifications of the site management plan have been made during the past five years to reflect new information and adjust the framework for most efficient site cleanup. The original 16 operable units have been addressed through actual cleanup actions or consolidated for future action into two remaining operable units: 1) Community Soils and 2) Regional Water, Waste and Soils. Community Soils addresses threats to human health from arsenic in residential settings. A final decision will be made in September 1996 on an appropriate action level (currently proposed at 250 parts per million).

The largest remaining decision to be made at the Anaconda Smelter site is the Regional Water, Waste and Soils operable unit (ARWWSOU). This operable unit involves a huge geographic region surrounding the smelter, including interconnected surface and ground water impacts from large tailings ponds, smelter emissions, and large smelter waste dumps. Earlier investigations over the past eleven years are being brought to completion in a comprehensive, coordinated manner so that a final cleanup decision can fully integrate everything known about the site. This decision, expected in 1997, involves important considerations about present and future land and ground water uses and local government involvement in comprehensive institutional controls that must have adequate legal and funding support. A recent decision by EPA to put this operable unit under the aegis of an agency fund-lead will allow a more efficient, timely decision to be made as to a final remedy for the remaining site problems.

Although some of the regional nature of the impacts at this site are contiguous to the Silver Bow Creek and Warm Springs Ponds areas, there is not thought to be significant off-site movement of contaminants. Therefore, the primary remaining sequencing issues concern ways to most efficiently reclaim large areas of surface disturbance and contain large ground water contaminant plumes underlying massive tailings ponds or smelter waste areas.

## III. Refining Community Involvement

### *A. CERCLA and Beyond*

Through trial and error, EPA and MDEQ have learned that no Superfund project can succeed without the involvement and support of the affected community (ies). Community involvement has proved to be evolutionary over the 16 years of Superfund.

Originally, Superfund was envisioned as an all-out assault on the nation's worst hazardous waste sites, such as Love Canal (New York) and Times Beach (Missouri). The public would be involved at decision-making stages, and while keeping the community informed was implicit in the law, the desire for "meaningful involvement" was not buttressed by specific mandates. Experience with sites showed, however, that in many cases Superfund would be a long term program rather than the quick fix originally envisioned. Site investigations and cleanups sometimes stretched across decades, especially at huge mining sites in the West like the Clark Fork Basin. As a result, community involvement became a sustained relationship between environmental agencies and the public.

Congress reauthorized Superfund in 1986 to deal with the long term aspects of site cleanups and strengthen the ability of communities to be involved with "their" sites. EPA funds technical citizen involvement using $50,000 per site technical assistance grants (TAGs). In the Clark Fork Basin, three technical assistance grants have been awarded and extended since 1991: Silver Bow Creek/Butte Area and Montana Pole, Milltown Reservoir, and Anaconda Smelter. These grants allow citizens to hire technical specialists who can interpret data produced by EPA, MDEQ, and ARCO (or other PRPs), and represent citizen interests at technical meetings.

In addition to TAGs, EPA and MDEQ have learned other effective ways of increasing public involvement in the long process of Superfund. The key is to involve the affected community early in the process, especially in scoping the remedial investigation. Over time it has become obvious that citizens want to incorporate broader public concerns into the Superfund process, and can lend important insight and knowledge of their local areas to Superfund investigations. EPA and MDEQ are also better able to understand community concerns and address them if possible before they become obstacles to the decision-making process.

The matrix on page 5 describes EPA's efforts to coordinate our technical and decision-making activities with opportunities to go to the public to collect or disseminate information. The matrix shows those activities required by Superfund's regulations (the National Contingency Plan, or NCP), those that the Montana Office has adapted to fit interests in the Basin, and those that could potentially improve involvement opportunities.

### *B. A New Frontier*

EPA and the State face a new frontier for the Clark Fork Basin: years of study have led to implementing remedies. The task in front of the agencies is to involve affected communities to the degree desired by the communities and that is appropriate to the specific site or operable unit. The public was involved on an increasing basis during the remedial investigations and feasibility studies conducted throughout the basin. The agencies learned to allow early and meaningful involvement in investigations. At this point at many operable units, however, investigations have given way to remedies, and EPA and MDEQ must continue to involve the public in a meaningful way during design activities.

At Warm Springs Ponds, the agencies made their first foray into involving multiple interests in the remedial design process. Involvement at Warm Springs Ponds was reasonably open and informal, but EPA and MDEQ learned that some aspects of the design approval process needed formalization to avoid confusion.

For the Streamside Tailings design process, Butte-Silver Bow and Anaconda-Deer Lodge counties will be formally involved as active partners in designing a remedy that will incorporate institutional controls because local authority will be needed to implement and maintain the institutional controls. In addition, county plans to manage Silver Bow Creek as a recreational corridor will be considered during the remedial design process. The agencies are also aware of the need to involve other stakeholders, such as the TAG recipients for the site, downstream local governments, and other interest groups. Their involvement, while not a formal part of the remedy design team, will be facilitated using briefings and other opportunities to review design documents.

This approach is an evolution from earlier examples of design activities. An example is the Old Works/ East Anaconda Development Area operable unit design process. In Anaconda, the county was an integral partner in design mostly because of the transfer of land ownership from ARCO to the county to facilitate redevelopment of the affected lands. In addition, the Old Works OU was expanded to include the site of an earlier remedial action, Mill Creek. The county wished to use the Mill Creek area as a storage area for junk vehicles, as well as a target range. These property transfers required close involvement of Anaconda-Deer Lodge officials in design; still, design itself was left to the agencies and ARCO.

Similarly, the Butte Mine Flooding design process has a community group coordinating education activities, but not directly involved in technical design meetings.

EPA and MDEQ hope that coordinated, open involvement of stakeholders in the design process at Rocker, Streamside Tailings, Mine Flooding, Community Soils, and other operable units will result in an appropriate, meaningful level of public involvement. What we learn at these operable units will assist the decision-making process on the Milltown Reservoir and Clark Fork River projects and at Anaconda Regional Water, Waste and Soils. The ultimate goal of EPA and MDEQ is to design remedies that are consistent with local land use plans, that most people can support, and that others will not be inclined to dispute. The design process combined with public involvement will not be without a learning curve; still, the agencies commit to an increased level of public participation in the design process, and hope that all parties will listen to each other and strive to find common ground in decisions that lay ahead.

## IV. Reforming Superfund

Throughout Superfund's 16 year existence, calls have come from all sectors to improve the day-to-day implementation of the law. EPA listened, and acted. Reauthorization in 1986 brought changes such as Technical Assistance Grants, more active state involvement, and a longer term perspective for selecting remedies. More was needed, though, and beginning with a management study in 1989, EPA began internal reforms to make Superfund, "faster, fairer, and more efficient." Since then, major Superfund reforms have been put into practice. Some of these reforms, such as removing liability barriers for prospective purchasers of contaminated property, had immediate and substantial impacts in Montana. The prospective purchasers reform allowed the development of the Anaconda Old Works Golf Course as a component of site cleanup.

Other reforms were helpful to increase public involvement. One such action was to soften the requirement for a 20% cash match for a TAG. Now, an organization can make a 20% in-kind match, thereby utilizing present staff or volunteer time to do required paperwork and other nontechnical tasks. This change is very important to small community groups that want to participate in Superfund using a TAG.

A table of some of the reforms follows on page 7, several of which have already been implemented in Montana.

## V. Completing Remaining Actions

As of the middle of 1996, the majority of Superfund projects in the Clark Fork River basin originally defined in the 1990 Master Plan are past the study stage and have been or are being implemented. The

**Public Involvement In Superfund**

EE/CA = Engineering Evaluation/Cost Analysis
RI/FS = Remedial Investigation/Feasibility Study
ROD = Record of Decision
RD = Remedial Design
RA = Remedial Action
O&M = Operation & Maintenance

| | STUDY (RI/FS, TCRAs, ERAs) | | | | | REMEDY SELECTION | | | IMPLEMENTATION | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | RI/FS Scoping | Risk Assessment Scoping/Conduct | Draft RI or Draft EE | Alternatives Screening/Draft FS or CA | RI/FS or EE/CA | Proposed Plan | ROD | Consent Decree Negotiation | RD | RA | O&M |
| General public review and comment *without* response to comments | ● | ● | ● | ● | | | | | | | |
| General public review and comment *with* response to comments | | | | | ■<br>● | ■<br>● | | | | | |
| Special public work group review and comments without response to comments | | ● | | | | | | | | | |
| Special public work group meetings (MTAC, CTEC, Arrowhead, Powell County Task Force, etc.) | | ● | ● | ● | ● | | | | ● | | |
| General public information meeting, pre-/post-design briefing/fact sheet | ● | ● | ● | ● | ● | ● | ●<br>◆ | | ■<br>● | ◆ | |
| Formal public hearing with responsiveness summary | | | | | | ■<br>● | | | | | |
| Meeting upon request | | | | | ● | ● | | | ● | ● | ◆ |

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■ Public involvement required by law (CERCLA/SARA)
● Current (MT public involvement practice)
◆ Potential additional public involvement

pace of cleanup activities is accelerating and the positive benefits of the extensive study phase are now being realized. It is currently estimated that actual cleanup expenditures are several times greater than the amount that has been spent on studies. The Clark Fork projects are currently at one of the following stages: construction complete; construction underway; design underway; investigation underway; and, those not initiated. The matrix below shows the current status of each of the projects. The active and planned projects are also shown on the schedules at the back of this booklet.

The matrix does not mesh precisely with the 28 operable units identified in the 1990 Master Plan because of consolidation of some of the original operable units. It also does not reflect some of the expedited interim cleanup actions that have occurred at some operable units (example projects include Lower Area One, Rocker, Travona, Old Works, Anaconda Community Soils, and Montana Pole).

It is essential that the cleanup projects identified above continue to move ahead as quickly as possible. Significant steps have been taken at the Clark Fork Superfund sites over the past few years to streamline the Superfund process in order to make sound decisions within acceptable time frames. Now the pressure is becoming even more intense to work still faster with tighter budgets.

**Clark Fork Superfund Projects' Status**

| PROJECTS | CONSTRUCTION COMPLETE | CONSTRUCTION UNDERWAY | DESIGN UNDERWAY | INVESTIGATION UNDERWAY | NOT INITIATED |
|---|---|---|---|---|---|
| Butte Mine Waste Source Areas | ● | | | | |
| Mill Creek Relocation | ● | | | | |
| Arbiter/Beryllium Wastes | ● | | | | |
| Flue Dust | ● | | | | |
| Warm Springs Ponds | ● | | | | |
| Milltown Water Supply | ● | | | | |
| Mine Flooding (Horseshoe Bend Diversion) | ● | | | | |
| Butte Residential Soils | | ● | | | |
| Butte Storm Water Control | | ● | | | |
| Anaconda Old Works | | ● | | | |
| Lower Area One<br>*Colorado Tailings/Butte Reduction Works* | | ● | | | |
| Montana Pole | | ● | | | |
| Mine Flooding | | | ● | | |
| Streamside Tailings | | | ● | | |
| Rocker | | | ● | | |
| Butte Priority Soils | | | | ● | |
| Anaconda Community Soils | | | | ● | |
| Anaconda Regional Water, Waste and Soils | | | | ● | |
| Clark Fork River | | | | ● | |
| Milltown Reservoir Sediments/Ground Water | | | | ● | |
| Butte Non-Priority Soils | | | | | ● |
| Butte Active Mine Area | | | | | ● |

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## VI. Measuring Success

Along with the need to move quickly is the need to be able to track and measure progress toward achieving cleanup goals in the basin. For a river system, a long-term monitoring program that includes physical, chemical and biological components is essential. It should be structured properly to detect and evaluate improvements and be adaptable to changing monitoring needs. This type of monitoring program has been in place for a number of years, and is expected to continue, through a collaborative effort involving several federal and state agencies and ARCO.

Successful Superfund response actions in the Clark Fork Basin will have to meet the test of reducing risk to human health and the environment to an acceptable level, while meeting all required local, state, and federal regulations. The notion of "acceptable risk" will always present a philosophical challenge to a diverse public because of the implicit understanding that some level of residual risk may be unavoidable. In the final analysis, EPA and MDEQ expect to be able to demonstrate that the selected remedies do indeed protect the Clark Fork Basin over the long term, and that an open and fair process was used in selecting and implementing remedies.

# Superfund: Fundamentally Different Through Reforms

## REFORMS I – June 1993

| Reform | Impact |
|---|---|
| Streamline process for providing relief to *De Minimis* parties. | Protected over 11,000 *De Minimis* parties since inception. |
| Provide protection to even smaller *(De Micromis)* parties by stating EPA's position that they not be pursued. | Eliminated thousands of small contributors from the Superfund liability net. |
| Remove liability barriers for potential purchasers of contaminated property. | Facilitated redevelopment opportunities at over 15 contaminated sites. |
| Reduce the cost and duration of cleanups through guidance on presumptive remedies. | Issued presumptive remedies for volatile organic compounds and municipal landfill sites. |
| Enhance the role of states in Superfund. | Deferred 22 sites to states through 7 EPA/State agreements |

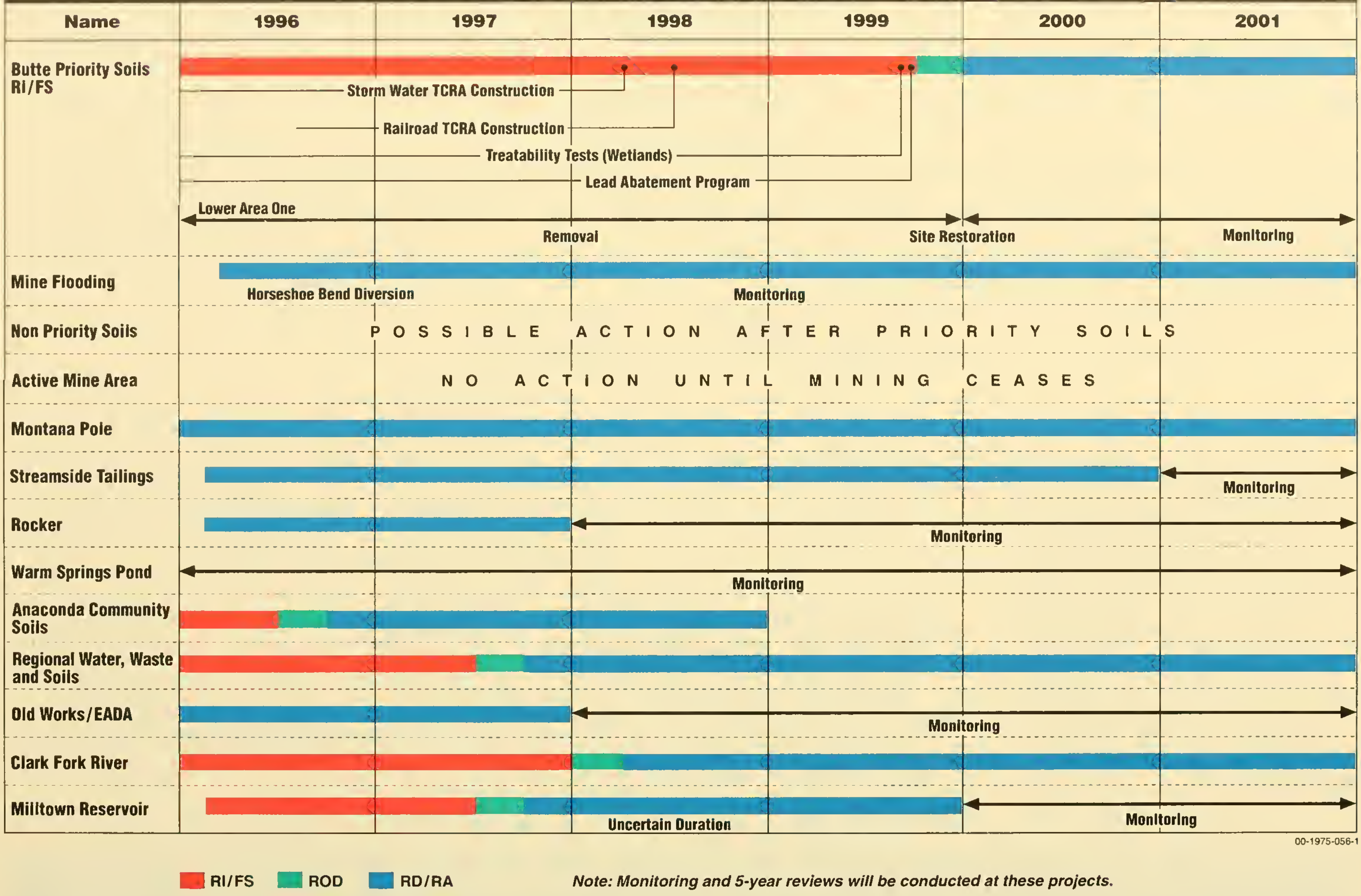
## REFORMS II – February 1994

| Reform | Impact |
|---|---|
| Test drive the allocation process where neutral party allocates shares among responsible parties. | Resolving allocation disputes at test sites and gaining critical experience to develop efficient process. |
| Provide relief to lenders by clarifying application of liability exemption. | Reassured lenders to effectuate redevelopment opportunities and provide comfort to property owners. |
| Promote economic redevelopment of former Superfund sites. | Awarded 18 Brownfields pilots.<br>Removed 24,000 sites from the Superfund inventory (CERCLIS). |
| Reduce the cost and duration of cleanup through additional guidance. | Issued goundwater guidance and land use guidance. |

## REFORMS III – October 1995

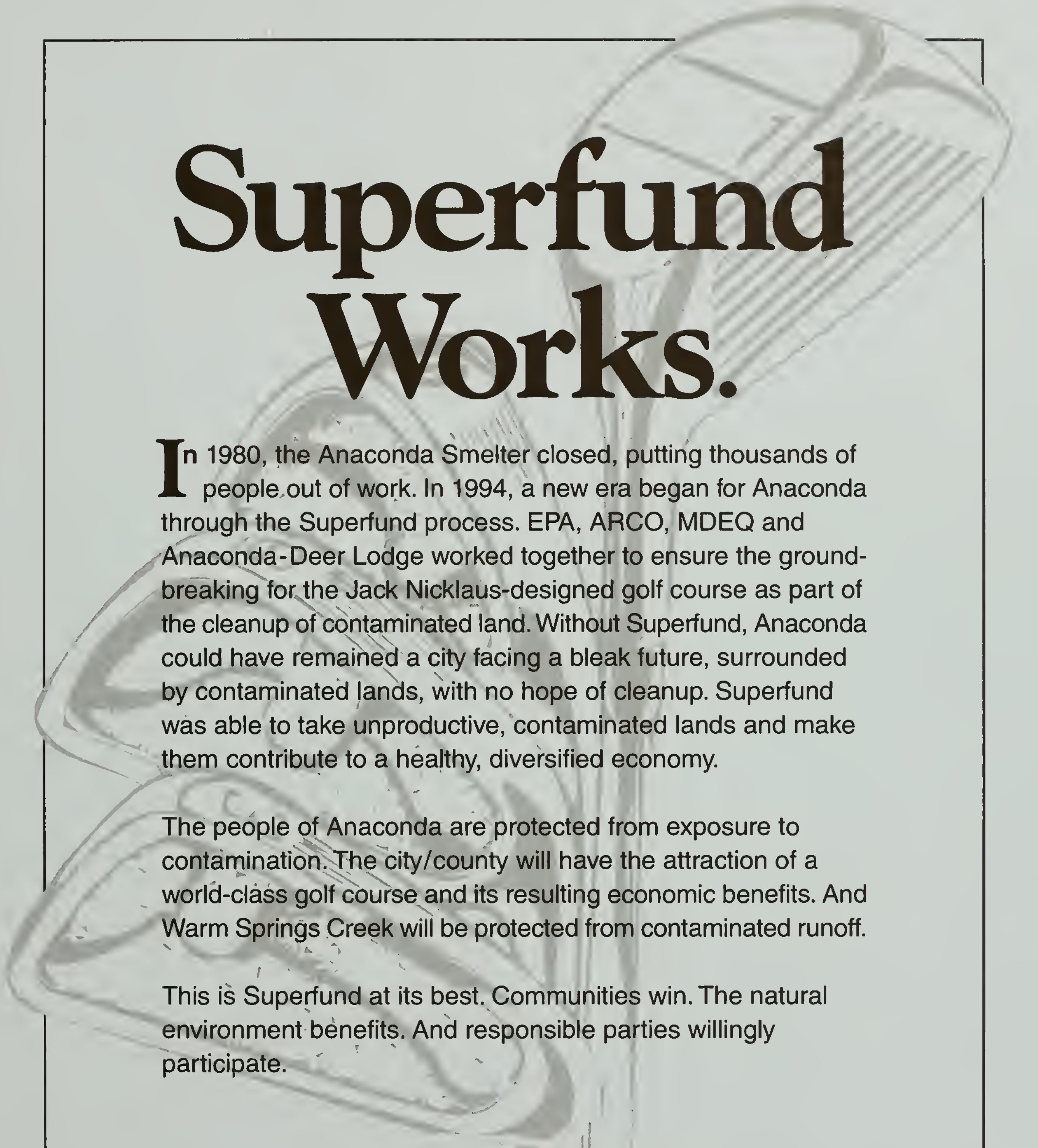
| Reform | Impact |
|---|---|
| Compensate settlors for a portion of orphan share. | Reduce responsibility of cooperative parties for share attributable to insolvent parties. |
| Further increase number of protected small contributors. | Eliminate greater numbers of small parties from Superfund liability net. |
| Reduce oversight of cooperative parties performing remedies. | Decrease transaction costs associated with oversight of parties. |
| National remedy review board. | Remedy cost savings. |
| Remedy "Rules of Thumb." | Time and cost savings. |
| Economic redevelopment. | Deleting portions of sites. |
| Fostering national consistency. | Faster, fairer cleanups.<br>Reasonable risk assessments.<br>Reduced PRP oversight. |

# Updated Clark Fork Superfund Schedule



*Note: Monitoring and 5-year reviews will be conducted at these projects.*

# Superfund Works.



In 1980, the Anaconda Smelter closed, putting thousands of people out of work. In 1994, a new era began for Anaconda through the Superfund process. EPA, ARCO, MDEQ and Anaconda-Deer Lodge worked together to ensure the ground-breaking for the Jack Nicklaus-designed golf course as part of the cleanup of contaminated land. Without Superfund, Anaconda could have remained a city facing a bleak future, surrounded by contaminated lands, with no hope of cleanup. Superfund was able to take unproductive, contaminated lands and make them contribute to a healthy, diversified economy.

The people of Anaconda are protected from exposure to contamination. The city/county will have the attraction of a world-class golf course and its resulting economic benefits. And Warm Springs Creek will be protected from contaminated runoff.

This is Superfund at its best. Communities win. The natural environment benefits. And responsible parties willingly participate.

**Superfund is the fuel that powers productive change.**

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